

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION**

IN RE: TERESA BATTLE

**CASE NO.: 14-04412-5-SWH
CHAPTER 13**

DEBTOR(S)

NOTICE OF MOTION TO MODIFY PLAN

NOTICE IS HEREBY GIVEN of Motion To Modify Chapter 13 Plan filed simultaneously herewith by attorney, ALLEN C. BROWN in the above captioned case;

FURTHER NOTICE IS HEREBY GIVEN that if you fail to respond or otherwise plead or request a hearing, in writing, by January 4, 2015, the relief requested in the Motion may be granted without further hearing or notice; and

FURTHER NOTICE IS GIVEN that if a response and request for a hearing is filed by the creditors, trustee, or other parties in interest named herein in writing within the time indicated, a hearing will be conducted on the Motion and response thereto, at a date, time and place to be later set by this Court and all interested parties will be notified accordingly.

DATED: December 9, 2015

BY: /s/Allen C. Brown
Allen C. Brown
Attorney for Debtor(s)
3493-C S. Evans St.
Bedford Commons
Greenville, NC 27835
PO BOX 1909
Winterville, NC 28590
(252) 752-0952
State Bar #: 12131

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION**

IN RE: TERESA BATTLE

**CASE NO.: 14-04412-5-SWH
CHAPTER 13**

DEBTOR(S)

MOTION TO MODIFY CHAPTER 13 PLAN

NOW COMES, the debtor, by and through counsel, petitioning the court to modify her plan in the following terms:

This plan requires a modification because the debtor is getting a reverse mortgage on her residence and this will pay the mortgage off in full and the mortgage will be removed from the debtor's plan. The new plan will be \$1305.00 for 15 months; and then \$1000.00 for 45 months.

WHEREFORE, the debtor moves this honorable court, to enter an order confirming the debtor's modified Chapter 13 plan.

December 9, 2015

BY: /s/Allen C. Brown
Allen C. Brown
Attorney for Debtor(s)
3493-C S. Evans St.
Bedford Commons
Greenville, NC 27835
PO BOX 1909
Winterville, NC 28590
(252) 752-0952
State Bar #: 12131

CERTIFICATE OF SERVICE

I, ALLEN C. BROWN, attorney for the Debtor certify:

1. That I am at all times hereinafter mentioned more than eighteen (18) years of age.
2. That on the 9TH day of December, 2015, I served copies of the foregoing: Motion To Modify on the following:

Richard M. Stearns
Chapter 13 Trustee
Via Electronic Filing

United States Bankruptcy Court
Via Electronic Filing

Teresa Battle
211 Adams Blvd
Greenville, NC 27858

SEE ATTACHED MAILING MATRIX FOR LISTING OF CREDITORS

by depositing said document in the United States Mail, postage prepaid. I certify under penalty of perjury that this foregoing is true and correct.

Executed: December 9, 2015

BY: /s/Allen C. Brown
Allen C. Brown
Attorney for Debtor(s)
3493-C S. Evans St.
Bedford Commons
Greenville, NC 27835
PO BOX 1909
Winterville, NC 28590
(252) 752-0952
State Bar #: 12131

| | | |
|---|---|---|
| Label Matrix for local noticing 0417-5 Case 14-04412-5-SWH Eastern District of North Carolina Raleigh Tue Nov 10 11:32:47 EST 2015 | Alabama Credit dba Preferred Teache c/o Kirschbaum, Nanney, Keenan & Gr PO Box 19806 Raleigh NC 27619-9806 | Alabama Credit dba Preferred Teachers c/o Kirschbaum, Nanney, Keenan & Griffin PO Box 19806 Raleigh, NC 27619-9806 |
| Bankruptcy Administrator Two Hannover Square, Ste. 640 434 Fayetteville Street Raleigh, NC 27601-1701 | Teresa P Battle 211 Adams Blvd Greenville, NC 27858-4818 | Allen C Brown Allen C. Brown, PA PO Drawer 1909 Winterville, NC 28590-1909 |
| Cavalry Portfolio Serv Po Box 27288 Tempe, AZ 85285-7288 | Financial Data Systems 1638 Military Cutoff Rd Wilmington, NC 28403-5716 | (c)GREEN TREE SERVICING L 332 MINNESOTA ST STE E610 SAINT PAUL MN 55101-1311 |
| (p)GREENTREE SERVICING LLC BANKRUPTCY DEPARTMENT P O BOX 6154 RAPID CITY SD 57709-6154 | IRS Kelvin Guthrie 4905 Koger Blvd Suite 102, M/S 9 Greensboro, NC 27407-2734 | (p)INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346 |
| IRS PO BOX 7346 Philadelphia, PA 19101-7346 | IRS Insolvency new 2303 Meadowview Rd. mail stop 9 Greensboro, NC 27407-3701 | Interntl Po Box 7955 Mobile, AL 36670-0955 |
| MARINER FINANCE NORTH CAROLINA, INC F/K/A SECURITY FINANCE CORPORATION 8211 TOWN CENTER DRIVE NOTTINGHAM, MD 21236-5904 | NC Department of Revenue PO Box 25000 Raleigh, NC 27626-5000 | NCDR PO Box 1168 Raleigh, NC 27602-1168 |
| David P. Nanney Jr. Kirschbaum, Nanney, Keenan & Griffin, PA PO Box 19766 Raleigh, NC 27619-9766 | Pamela P. Keenan PO Box 19806 Raleigh, NC 27619-9806 | Santander Consumer USA, Inc. Po Box 560284 Dallas, TX 75356-0284 |
| Santander Consumer Usa Po Box 961245 Ft Worth, TX 76161-0244 | Sca Collections Inc Po Box 876 Greenville, NC 27835-0876 | Richard M Stearns 1015 Conference Drive Greenville, NC 27858-5969 |
| Williamsburg Plantation 3015 North Ocean Blvd Suite 121 Fort Lauderdale, FL 33308-7344 | | |

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Green Tree Servicing, LLC
P.O. Box 6154
Rapid City, SD 57709-6154
Telephone number: 888-298-7785

IRS
320 Federal Place Rm 335
Greensboro, NC 27401

(d)IRS
PO Box 21126
Philadelphia, PA 19114

(d)Internal Revenue Service
Insolvency Support Services
320 Federal Place, Room 335
Greensboro, NC 27401

Addresses marked (c) above for the following entity/entities were corrected
as required by the USPS Locatable Address Conversion System (LACS).

Green Tree Servicing L
332 Minnesota St Ste 610
Saint Paul, MN 55101

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

| | | |
|---|---------------------|----|
| (u)Alabama Credit Corporation dba Preferred T | End of Label Matrix | |
| | Mailable recipients | 24 |
| | Bypassed recipients | 1 |
| | Total | 25 |